

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

ERIC HINES

COMPLAINT

v.

CIVIL ACTION NO. \_\_\_\_\_

GARY M. LANIGAN, ET AL.,

PATRICK A. NOGAN

MR. BONDS

SHARMALIE PERERA, MD

DR. AL NOCHANATI

DR. MILLER

DR. DIAZ

JENNIFER FAIRSTEAD, NP

SCO. MARVIN

SCO. WATERS

S.I.D PERRY

SGT. J. VALLE

SID PETIT

S.I.D JOHN DOE

7. If your application to proceed in forma pauperis does not conform to these instructions, you will be notified by letter of the nature of the deficiencies. If these deficiencies are not cured within 120 days of the date of the letter, the complaint will be deemed withdrawn, the Clerk's file will be closed, and no fees will be assessed against you.
8. If you are given permission to proceed in forma pauperis, the Clerk will prepare and issue a copy of the summons for each defendant. The copies of the summonses and the copies of the Complaint which you have submitted will be forwarded by the Clerk to the United States

DNJ-ProSe-00 G-07-(06/98)

**FORM TO BE USED BY A PRISONER IN FILING A  
CIVIL RIGHTS COMPLAINT**

Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

**QUESTIONS TO BE ANSWERED**

1. Jurisdiction is asserted pursuant to (CHECK ONE)

✓      42 U.S.C. § 1983 (applies to state prisoners)

\_\_\_\_\_      Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics,  
403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

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2. Previously Dismissed Federal Civil Actions or Appeals

If you are proceeding in forma pauperis, list each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted. Please note that a prisoner who has on three or more prior occasions, while detained in any facility, brought an action or appeal in a federal court that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted, will be denied in forma pauperis status unless that prisoner is under imminent danger of serious physical injury. See 28 U.S.C. § 1915 (g).

A. Parties to previous lawsuit:

Plaintiff(s): N/A

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Defendant(s): N/A

B. Court and Docket Number: \_\_\_\_\_

C. Grounds for dismissal: ( ) frivolous ( ) malicious ( ) failure to state a claim upon which relief may be granted

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D. Approximate date of filing lawsuit: N/A

E. Approximate date of disposition: N/A

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on separate sheets.

3. Place of Present Confinement? N/A

4. Parties

(In item (a) below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: ERIC HINES

Address: SOUTH WOODS STATE PRISON, 215 BURLINGTON ROAD, BRIDGEPORT  
NEW JERSEY 08302

Inmate #: 663508

B. First defendant - name: GARY M. LANIGAN

Official position: COMMISSIONER, DEPARTMENT OF CORRECTION

Place of employment: WHITTLESEY ROAD, P.O. BOX 863, TRENTON, N.J. 08625-0863

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

VIOLATION OF TITLE OF THE ADA AND THE REHABILITATION ACT, BREACH OF  
DUTY, WANTON NEGLIGENCE, EIGHTH AMENDMENT VIOLATION, FAILURE TO  
ADHERE WITH LEGISLATIVE LAWS MADE FACILITY HANDICAP ACCESSIBLE  
WHEN RECEIVING FEDERAL GRANT MONEY, PHYSICAL, EMOTION, MENTAL,  
INJURY DUE TO NEGLIGENCE, DISCRIMINATION ADA INMATE IN SEGREGATION  
SERVING INDIVIDUAL AND WORK CAPACITY

FIRST AMENDMENT RIGHT TO REDRESS, FAILURE TO TRAIN, SUPERVISE, ADMINISTRATOR AND STAFF, GOVERNING ADMIN APPEAL REMEDY SYSTEM COORD.

C. Second defendant - name: PATRICK A. NOGAN

Official position: ADMINISTRATOR

Place of employment: EAST JERSEY STATE PRISON, 1100 WOODBRIDGE, RAILWAY NJ 07065

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

FAILURE TO TRAIN, OR SUPERVISE REMEDY SYSTEM COORDINATOR ON LEGAL DUTY, ADMIN. APPEAL NOT REDRESS, VIOLATE OF TITLE II OF THE ADA AND REHABILITATION ACT, PHYSICAL, EMOTION, MENTAL, INJURY INDIVIDUAL AND WORK CAPACITY.

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D. If there are more than two defendants, attach a separate sheet. For each defendant specify:  
(1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

YES       NO

If your answer is "Yes", briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

EAST JERSEY STATE PRISON  
CASE NUMBER 14-08-0002, INMATE INQUIRY 6/9/2015, AND ADMINISTRATOR  
APPEAL 1-7-2015 ADMIN. N. PATRICK A. NOGAN STATED NO REDRESS WAS  
FOR IT COMING SWSP - INMATE INQUIRY 3/29/16, 12/23/16, 1/7/17,  
12/29/16, AND ADMIN. APPEAL 1/26/17 NONE HAVE BEEN RETURNED  
PLEASE SEE DOCUMENTS ENCLOSED.

If your answer is "No", briefly explain why administrative remedies were not exhausted.

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